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Filing date: **03/21/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92046185
Party	Plaintiff Amanda Blackhorse, Marcus Briggs, Phillip Gover, Shquanebin Lone-Bentley, Jillian Pappan, and Courtney Tsotigh
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Signature	/Jesse A. Witten/
Date	03/21/2012
Attachments	Notice of Deposition - Pappan exhibits 1-6.pdf (28 pages)(4563165 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In re Registration No. 1,606,810 (REDSKINETTES)
Registered July 17, 1990,

Registration No. 1,085,092 (REDSKINS)
Registered February 7, 1978,

Registration No. 987,127 (THE REDSKINS & DESIGN)
Registered June 25, 1974,

Registration No. 986,668 (WASHINGTON REDSKINS & DESIGN)
Registered June 18, 1974,

Registration No. 978,824 (WASHINGTON REDSKINS)
Registered February 12, 1974,

and Registration No. 836,122 (THE REDSKINS—STYLIZED LETTERS)
Registered September 26, 1967

Amanda Blackhorse, Marcus Briggs,)	
Phillip Gover, Jillian Papan, and)	
Courtney Tsotigh,)	
)	
Petitioners,)	
)	
v.)	Cancellation No. 92/046,185
)	
Pro-Football, Inc.,)	
)	
)	
Registrant.)	
_____)	

**ATTACHMENT TO PETITIONERS' NOTICE OF FILING OF DEPOSITION OF
JILLIAN PAPPAN**

EXHIBITS 1-6

Respectfully Submitted,

/Jesse A. Witten/

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Dated: March 21, 2012

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE
TRADEMARK TRIAL AND APPEAL BOARD**

In re Registration No. 1,606,810 (REDSKINETTES)
Registered July 17, 1990,
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Amanda Blackhorse, Marcus Briggs,)	
Phillip Gover, Shquanebin Lone-Bentley)	
Jillian Pappan, and Courtney Tsotigh)	Cancellation No. 92/046,185
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Petitioners,)	
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v.)	
)	
Pro-Football, Inc.)	
)	
Registrant.)	
)	

**PETITIONER JILLIAN PAPPAN'S RESPONSE TO RESPONDENT'S
FIRST SET OF INTERROGATORIES**

GENERAL OBJECTIONS

Petitioner Jillian Pappan ("Petitioner") responds to Respondent Pro-Football, Inc.'s ("Respondent") First Set of Interrogatories as follows:

A. Petitioner objects to each Interrogatory to the extent that it is vague or ambiguous.

B. Petitioner objects to each Interrogatory to the extent that it seeks information subject to the attorney-client privilege, the work product doctrine, or any other applicable

privilege. Petitioner makes this response on the condition that the inadvertent disclosure of information covered by any privilege, rule, or doctrine does not waive any of Petitioner's rights to assert such privilege, rule, or doctrine.

C. Petitioner objects to each Interrogatory to the extent that it imposes an unreasonable or undue burden on Petitioner.

D. Petitioner objects to each Interrogatory to the extent that it seeks information not reasonably calculated to lead to the discovery of admissible evidence.

E. Petitioner objects to each Interrogatory to the extent that it seeks information that is publicly available including but not limited to information in newspapers and other periodicals, government reports, public statements of organizations, and published books.

F. Petitioner objects to the definition of "Respondent" (Respondent's Instruction 2) as unduly burdensome because Petitioner does not know, and cannot reasonably ascertain, all of the directors, officers, employees, agents, and representatives of Pro-Football, Inc.

G. Petitioner objects to the definitions of "Petitioner," "You" and "Your" (Respondent's Instructions 3 and 4) because those definitions are vague and ambiguous, overbroad and unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence. By way of example, Respondent's definitions are so broad as to even require Petitioner to respond with respect to Petitioner's attorneys. Subject to other objections, Petitioner will respond to the Interrogatories only as to Petitioner.

H. Petitioner objects to Instructions 9, 10, 11, 12, and 13 to the extent that the use of the referenced terms ("all," "each," "any," "all," "and," "or," singular and plural forms of words, and varying verb tenses) renders an Interrogatory subject to more than one reasonable interpretation and therefore vague or ambiguous.

I. Petitioner objects to Respondent's Instruction 22 (regarding claims of privilege) because it is inapplicable to an interrogatory, unduly burdensome, and beyond the scope of Federal Rule of Procedure 33.

J. The responses set forth below are for the purposes of discovery only, and Petitioner neither waives nor intends to waive, but expressly reserves, any and all objections it may have to the relevance, competence, materiality, admission, admissibility, or use at trial of any information produced, identified, or referred to herein, or to the introduction of any evidence at trial relating to the subjects covered by such responses.

K. Petitioner expressly reserves its right to rely, at any time including trial, upon subsequently discovered information or information omitted from the specific responses set forth below as a result of mistake, oversight, or inadvertence.

L. The responses set forth below are based upon Petitioner's interpretation of the language used in the Interrogatories, and Petitioner reserves its right to amend or to supplement its responses in the event Respondent asserts an interpretation that differs from Petitioner's interpretation.

M. Because Petitioner may not have discovered all the information that is possibly within the scope of the Interrogatories, Petitioner expressly reserves its right to amend or to supplement these Objections and Responses with any additional information that emerges through discovery or otherwise.

N. By making these responses, Petitioner does not concede that any response given is relevant to this proceeding.

O. Petitioner objects to Instruction 19 as vague and incomprehensible.

INCORPORATION OF GENERAL OBJECTIONS

All of the foregoing General Objections are hereby restated and incorporated by reference into the Responses and Objections to each of the Interrogatories.

INTERROGATORIES

INTERROGATORY NO. 1. State:

- (a) your full name;
- (b) your residence since 1996;
- (c) your date and place of birth;
- (d) your social security number;
- (e) your employment since 1996, including the name, address and type of business of your employer(s), the dates of your employment for each employer and your position(s) or job title(s) for each employer; and
- (f) all educational institutions you have attended after high school, including the dates of attendance, your major fields of study and degrees earned, if any.

RESPONSE:

Subject to and without waiving the general objections, Petitioner responds as follows:

(a) Petitioner's full name is Jillian May Pappan.

(b) From January 1996 through July 2009, her place of residence was Sioux City, Iowa. From July through February 2009, her place of residence was Macy, Nebraska. Since February 2009, she has lived in Sioux City, Iowa.

(c) Petitioner was born on May 9, 1987, in Sioux City, Iowa.

(d) Petitioner objects because this Interrogatory seeks sensitive information and is not reasonably calculated to lead to admissible evidence.

(e) From February 2007 through May 2007, Petitioner was a deli clerk at SDSU's JACK's Place Deli in Brookings, South Dakota; from November 2007 through December 2007, Petitioner was a waitress at Horizons Restaurant in Sioux City, Iowa; from June through July of 2007 Petitioner was an enlisted soldier in the Airforce in San Antonio, Texas; from June through

July of 2008, Petitioner was a waitress at Parerro's Place bar in Sioux City, Iowa; from October through May 2009 Petitioner was a customer service agent at the Alorica call center in North Sioux City, South Dakota; from June through July 2009 Petitioner was a cashier at Walmart in Sioux City, Iowa; and from September through December 2009, Petitioner was a medical chore provider. In this last position she was paid by the State of Nebraska, and she took care of her grandmother, who lived at PO Box 445, Macy, Nebraska, 68039.

(f) Petitioner attended South Dakota State University from September 2006 through May 2007, concentrated in journalism, and did not receive a degree. Petitioner attended Nebraska Indian Community College from August 2008 through May 2010 and obtained an Associates of Arts degree. She did not have an area of concentration.

INTERROGATORY NO. 2. Identify the Native American Journalists Association and describe your relationship, affiliation or connection thereto, including:

- (a) identify and describe all positions held by you, including "member" as stated in the Petition for Cancellation, the dates you held each position and the duties and responsibilities for each position; and
- (b) identify all officers and directors of the Native American Journalists Association since 2001.
- (c) identify and describe all communications concerning the Native American Journalists Association's support, sponsorship, criticism or disapproval of your participation in or claims asserted in this cancellation proceeding.

RESPONSE:

Petitioner objects because this Interrogatory is compound, overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

Petitioner was a member of the Native American Journalists Association from May 2006 through August 2007, held no other positions in the Association, does not know the names of any

of the Association's officers and directors, and is not aware of any position the Association may have taken regarding her participation or the claims asserted in this cancellation proceeding.

INTERROGATORY NO. 3. Identify the Omaha Tribe of Macy, Nebraska and describe your relationship, affiliation or connection thereto, including:

- (a) identify and describe all positions held by you, including "member" as stated in the Petition for Cancellation, the dates you held each position and the duties and responsibilities for each position;
- (b) identify all leaders, officers and directors of the Omaha Tribe of Macy, Nebraska since 2001; and
- (c) identify and describe all communications concerning the Omaha Tribe of Macy, Nebraska's support, sponsorship, criticism or disapproval of your participation in or claims asserted in this cancellation proceeding.

RESPONSE:

Petitioner objects because this Interrogatory is compound, overbroad, unduly burdensome, seeks information that is publicly available and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

Petitioner is a member of the Omaha Tribe of Macy, Nebraska and she has never held any other position in the Tribe.

INTERROGATORY NO. 4. Identify and describe all relationships, affiliations or connections you have with any Native American group, club, organization, institution or tribe, including but not limited to any relationship, affiliation or connection in a legal, representative, elected, appointed, employed or membership capacity. For each such relationship, affiliation or connection, identify and describe:

- (a) the extent, responsibilities, benefits, entitlements and dates of your relationship, affiliation or connection; and
- (b) all documents concerning the relationship, affiliation or connection, including ones authorizing you to speak on behalf of any of the groups identified above.

RESPONSE:

Petitioner objects because this Interrogatory is compound, overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

In addition to the Native American Journalists Association, and the Omaha Tribe of Macy, Nebraska, Petitioner is not a member of any Native American group, club, organization, institution or tribe.

INTERROGATORY NO. 5. Identify and describe all communications with Respondent made by you or any group, club, organization, institution or tribe with which you are related, affiliated or connected, concerning the trade names, trademarks, service marks, nicknames, mascots, logos, or other identifying names or symbols of the Washington Redskins football club or any of the registrations at issue. For each such communication, also identify and describe the response to the communication from any person, including but not limited to Respondent.

RESPONSE:

Petitioner objects because this Interrogatory is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

Other than the documents filed in this cancellation proceeding, Petitioner has not communicated with the Respondent.

INTERROGATORY NO. 6. Identify and describe all communications between you or any group, club, organization, institution or tribe with which you are related, affiliated or connected, and any organizations, businesses or individuals involved in the news media, concerning the registrations at issue, the term "redskins" or any other trade names, trademarks, service marks, nicknames, mascots, logos, or other identifying names or symbols which you claim to be associated with Native Americans. For each such communication, identify and describe any documents pertaining thereto.

RESPONSE:

Petitioner objects because this Interrogatory is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

Petitioner gave interviews with the World Herald and the Tulsa World in August of 2006.

INTERROGATORY NO. 7. Identify and describe all communications between you or any group, club, organization, institution or tribe with which you are related, affiliated or connected, and any organizations, businesses or individuals involved in the publication of books, magazines, journals, treatises, textbooks or reference works, concerning the registrations at issue, the term “redskins” or any other trade names, trademarks, service marks, nicknames, mascots, logos, or other identifying names or symbols which you claim to be associated with Native Americans. For each such communication, identify and describe any documents pertaining thereto.

RESPONSE:

Petitioner objects because this Interrogatory is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

None.

INTERROGATORY NO. 8. Identify and describe all communications between you or any group, club, organization, institution or tribe with which you are related, affiliated or connected, and any organizations, businesses, individuals, schools or professional and amateur sports teams other than Respondent, concerning the registrations at issue, the term “redskins” or any other trade names, trademarks, service marks, nicknames, mascots, logos, or other identifying names or symbols which you claim to be associated with Native Americans. For each such communication, also identify and describe the response or reaction concerning the communication.

RESPONSE:

Petitioner objects because information responsive to this Interrogatory is subject to attorney-client privilege and the Interrogatory itself is overbroad, unduly burdensome and not reasonably calculated to lead to admissible evidence. Subject to and without waiving the

general or specific objections, Petitioner responds as follows:

Petitioner has spoken about these issues in a class called Advanced Placement for Basic Writing during the fall of 2005 and in the class Mass Communications during the fall of 2006.

INTERROGATORY NO. 9. Identify and describe any formal or informal surveys, investigations, studies, interviews, polls or market research conducted by or for you, or by or for any group, club, organization, institution or tribe with which you are related, affiliated or connected, concerning the term “redskins” or any of the trade names, trademarks, service marks, nicknames, mascots, logos, or other identifying symbols of the Washington Redskins football club.

RESPONSE:

Petitioner objects because this Interrogatory is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and is vague and ambiguous with respect to the use of the terms “surveys, investigations, studies, [and] interviews.” Subject to and without waiving the general or specific objections, Petitioner responds as follows:

None to her knowledge.

INTERROGATORY NO. 10. Identify the date on which you first learned of (a) Respondent's use of each of the terms or symbols or other matter in any of the registrations at issue and (b) Respondent's registration of each of the marks at issue.

RESPONSE:

Petitioner objects because this Interrogatory is unduly burdensome, vague and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

Petitioner believes she first learned of Respondent's use of the terms or symbols or other matter in the registrations at issue at the age of 15 or 16, and the Respondent's registration of the marks at issue in October of 2005, when she wrote a paper on this topic.

INTERROGATORY NO. 11. Describe the basis for your belief that you have been, are, and/or will be damaged from the registrations at issue, including but not limited to any monetary damage, any non-monetary damage, and the extent to which you allegedly are damaged in either capacity.

RESPONSE:

Petitioner objects because this Interrogatory is unduly burdensome and vague. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

The registrations damage Petitioner by disparaging her culture, her religion, her values, and her personal identity. They damage Petitioner by furthering the misconception that American Indians are extinct, not worthy of respect, or that they are backwards and have red skin. They damage Petitioner by giving millions of Washington NFL team fans and spectators of games involving the Washington NFL team a warped conception of her people.

INTERROGATORY NO. 12. Identify and describe the sources of any funds donated, given, bequeathed, granted, loaned or allocated to support your efforts to cancel the registrations at issue.

RESPONSE:

Petitioner objects because this Interrogatory is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

None.

INTERROGATORY NO. 13. Identify any other lawsuits, proceedings, civil actions and criminal actions in which you have participated concerning any trade names, trademarks, service marks, nicknames, mascots, logos, or other identifying names or symbols which you claim to be associated with Native Americans.

RESPONSE:

Petitioner objects because this Interrogatory is unduly burdensome and not reasonably

calculated to lead to the discovery of admissible evidence. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

None.

INTERROGATORY NO. 14. Identify and describe any services by you as a lobbyist or publicist, or your hiring or use of a lobbyist or publicist to work on your behalf, in connection with any issues concerning any trade names, trademarks, service marks, nicknames, mascots, logos, or other identifying names or symbols which you claim to be associated with Native Americans.

RESPONSE:

Petitioner objects because this Interrogatory is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

None.

INTERROGATORY NO. 15. Identify and describe any services by any group, club, organization, institution or tribe with which you are related, affiliated or connected, as a lobbyist or publicist, or their hiring or use of a lobbyist or publicist to work on their behalf, in connection with any issues concerning any trade names, trademarks, service marks, nicknames, mascots, logos, or other identifying names or symbols which you claim to be associated with Native Americans.

RESPONSE:

Petitioner objects because this Interrogatory is vague, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

None to her knowledge.

INTERROGATORY NO. 16. Identify and describe all facts that support your belief that the term "redskin" is "pejorative, derogatory, denigrating, offensive, scandalous, contemptuous, disreputable, disparaging and racist," as stated in paragraph 1 of the Petition for Cancellation.

RESPONSE:

Petitioner objects because this Interrogatory is overbroad, unduly burdensome and premature because Petitioner is still gathering evidence. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

Many dictionaries and other reference sources support the belief that the term “redskin” is “pejorative, derogatory, denigrating, offensive, scandalous, contemptuous, disreputable and racist.” In addition, Petitioner’s experience and knowledge regarding how the term “redskin” is and has been used in the English language (especially in contrast to how other terms like “Native American,” “Indian” and “American Indian” are used) supports Petitioner’s belief. The fact that others have also expressed the understanding that “redskins” is an offensive or disparaging term also supports Petitioner’s belief. For example, in 1999, the Trademark Trial and Appeals Board held that the term “redskin” is disparaging towards Native Americans. Similarly, many religious, civic and civil rights organizations, Native American organizations, and government entities have adopted resolutions or issued statements objecting to the name of the Washington NFL team because the term “redskins” is offensive and disparaging. Many organizations filed amicus curiae briefs filed in the *Harjo* matter stating that the term “redskins” is disparaging. Many newspaper and other media articles and editorials have also objected to the Washington Redskins team name as offensive and disparaging.

INTERROGATORY NO. 17. Identify and describe all facts that support your belief that additional matter in the registrations at issue is “offensive, disparaging and scandalous,” as stated in paragraph 1 of the Petition for Cancellation. For each fact given:

- (a) identify the date you first learned of that fact; and
- (b) identify and describe all documents supporting your belief.

RESPONSE:

Petitioner objects because this Interrogatory is overbroad, vague and unduly burdensome. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

Any derivation of the term "redskins" is offensive. Additionally, the trademarks which associate Native Americans with a spear are offensive, as are the trademarks that depict a stereotypical image of a Native American man with long hair, a stern, warrior-like image, and a severe curvature on his nose. These images reinforce a stereotypical image of Native peoples. The marks also stereotype Native American use of feathers.

INTERROGATORY NO. 18. Identify and describe any other terms or symbols other than those contained in the registrations at issue which you find to be pejorative, derogatory, denigrating, offensive, scandalous, contemptuous, disreputable, disparaging, racist or similarly objectionable as to Native Americans.

RESPONSE:

Petitioner objects because this Interrogatory is overbroad, unduly burdensome, vague, and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

By way of example, Petitioner believes that the following team names are pejorative, derogatory, denigrating, offensive, scandalous, contemptuous, disreputable, disparaging, and racist: the Fighting Sioux, the Cleveland Indians, the Florida State Seminoles, and the Atlanta Braves. The symbols of Chief Illiniwek from the University of Illinois and Chief Wahoo of the Cleveland Indians are also pejorative, derogatory, denigrating, offensive, scandalous, contemptuous, disreputable, disparaging, and racist to Native Americans.

INTERROGATORY NO. 19. Identify and describe any terms or symbols used to describe Native Americans which you do not find to be pejorative, derogatory, denigrating, offensive, scandalous, contemptuous, disreputable, disparaging, racist or similarly objectionable.

RESPONSE:

Petitioner objects because this Interrogatory is overbroad, unduly burdensome, vague and ambiguous. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

Petitioner does not find the terms "Native" or "Indian" to be offensive.

INTERROGATORY NO. 20. Identify and describe all Native American individuals, groups, clubs, institutions or tribes that disagree with your claim that the term "redskins" or the marks at issue are pejorative, derogatory, denigrating, offensive, scandalous, contemptuous, disreputable, disparaging or racist.

RESPONSE:

Petitioner objects because this Interrogatory is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

Petitioner does not personally know any Native Americans or Native American groups who do not find the term "redskins" or the marks at issue to be pejorative, derogatory, denigrating, offensive, scandalous, contemptuous, disreputable, disparaging or racist. She is generally aware that some American Indians may not be offended by the term "redskins."

INTERROGATORY NO. 21. Identify and describe all professional and amateur sports teams or organizations other than Respondent which use terms or symbols you find to be pejorative, derogatory, denigrating, offensive, scandalous, contemptuous, disreputable, disparaging or racist. For each sports team or organization named above, describe the actions, if any, taken by you or any group, organization, institution or tribe with which you are related, affiliated or connected, concerning the use of those terms.

RESPONSE:

Petitioner objects because this Interrogatory is compound, overbroad and unduly burdensome. Subject to and without waiving the general or specific objections, Petitioner

responds as follows:

By way of example, Petitioner believes that the following teams and schools have or have had pejorative, derogatory, denigrating, offensive, scandalous, contemptuous, disreputable, disparaging or racist terms and symbols associated with them: The Fighting Sioux, University Illinois, the Cleveland Indians, the Florida State Seminoles, the Atlanta Braves. Petitioner has not taken any action against these teams or schools concerning the use of those terms.

INTERROGATORY NO. 22. Identify and describe all persons or entities who have informed you in any manner they regard the term “redskins” or any of the marks at issue as pejorative, derogatory, denigrating, offensive, scandalous, contemptuous, disreputable, disparaging or racist.

RESPONSE:

Petitioner objects because this Interrogatory is overbroad, vague, unduly burdensome, not reasonable calculated to lead to the discovery of admissible evidence, and seeks information protected by the work product doctrine and the attorney-client privilege. Petitioner interprets this interrogatory as referring to occasions in which a person or entity has directed a communication specifically towards Petitioner, and not to the general public. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

At least the following individuals have informed Petitioner that they regard the term “redskins” and the marks at issue as pejorative, derogatory, denigrating, offensive, scandalous, contemptuous, disreputable, disparaging or racist: Suzan Harjo, students from the Advanced Placement for Basic Writing that Petitioner took in the fall of 2005, and students from the Mass Communications Class that Petitioner took in the fall of 2006.

INTERROGATORY NO. 23. Identify and describe each instance, if any, in which you, or any Native American person known to you, have owned, bought, found, possessed, or been given any item bearing any of the marks at issue or any of Respondent's other trade names, trademarks, service marks, nicknames, mascots, logos, or other identifying names or symbols which you claim to be associated with Native Americans. For each instance, identify and describe:

- (a) the item;
- (b) the date involved; and
- (c) whether you still have possession of the item.

RESPONSE:

Petitioner objects because this Interrogatory is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Petitioner also objects to the extent that this interrogatory would cover newspapers, books, published matter, computers temporarily displaying the marks on an Internet page, and similar items. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

Petitioner has not owned, bought, found, possessed, or been given any item bearing any of the marks at issue or any of Respondent's other trade names, trademarks, service marks, nicknames, mascots, logos, or other identifying names or symbols which associated with Native Americans. She does not know of any Native American who has.

INTERROGATORY NO. 24. Identify and describe each instance, including the relevant dates, if any, in which you, or any Native American person known to you, have been a spectator to all or part of a Washington Redskins football game, whether in person, on television, by radio, by Internet, or by some other medium.

RESPONSE:

Petitioner objects because this Interrogatory is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

Petitioner has not been a spectator to any Washington NFL team game and is not aware of any Native American who has.

INTERROGATORY NO. 25. Identify all speeches, articles, books, texts, contributions to periodicals, manuscripts and other presentations or writings, whether published or unpublished,

you have presented or written concerning Native American issues.

RESPONSE:

Petitioner objects because this Interrogatory is overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the general or specific objections, Petitioner responds as follows:

Petitioner wrote papers about Native American issues in the class Federal Indian Law the class Advanced Placement for Basic Writing.

INTERROGATORY NO. 26. Identify all experts you expect to call as a witness during the trial testimony period of this proceeding and for each expert, describe the subject matter of the testimony, the facts and opinions to be offered, and the bases for those opinions.

RESPONSE:

Petitioner objects because this Interrogatory is unduly burdensome and premature. Petitioner has not yet made a determination as to the witnesses, if any, she intends to call in this proceeding.

INTERROGATORY NO. 27. Identify and describe all communications with any of the petitioners in the cancellation action Harjo v. Pro-Football, Inc., Cancellation No. 92/021,069—namely, Suzan Shown Harjo; Raymond D. Apodaca; Vine Deloria, Jr.; Norbert S. Hill, Jr.; Mateo Romero; William A. Means; and Manley A. Begay, Jr.—concerning the registrations at issue, the term “redskins,” or any other trade names, trademarks, service marks, nicknames, mascots, logos, or other identifying names or symbols which you claim to be associated with Native Americans. For each such communication, also identify and describe any response to the communication from any person or organization.

RESPONSE:

Petitioner objects because this Interrogatory is overbroad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks information subject to and without waiving the work product doctrine. Subject to and without waiving the

general or specific objections, Petitioner responds as follows:

Petitioner has spoken twice with Suzan Harjo about the Petition to cancel the Respondent's registration.

INTERROGATORY NO. 28. Identify all persons from whom you or anyone acting on your behalf have obtained a statement in connection with this cancellation proceeding.

RESPONSE:

Petitioner objects because this Interrogatory is unduly burdensome, vague, ambiguous, unclear, and seeks information protected by attorney-client privilege and the work product doctrine.

INTERROGATORY NO. 29. Identify all witnesses you expect to call during the trial testimony period.

RESPONSE:

Petitioner objects because this Interrogatory is unduly burdensome and premature. Petitioner has not yet made a determination as to the witnesses, if any, she intends to call in this proceeding.

September 3, 2010

Respectfully submitted,

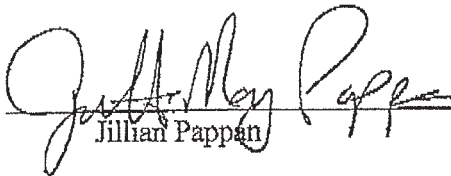
AS TO OBJECTIONS

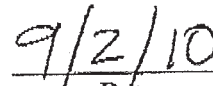


Phillip J. Mause
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and Courtney Tsotigh

I, Jillian Pappan, declare under penalty of perjury, that the information provided in the foregoing
PETITIONER'S RESPONSE TO RESPONDENT'S FIRST SET OF INTERROGATORIES is
true and correct to the best of my knowledge, information, and belief.


Jillian Pappan

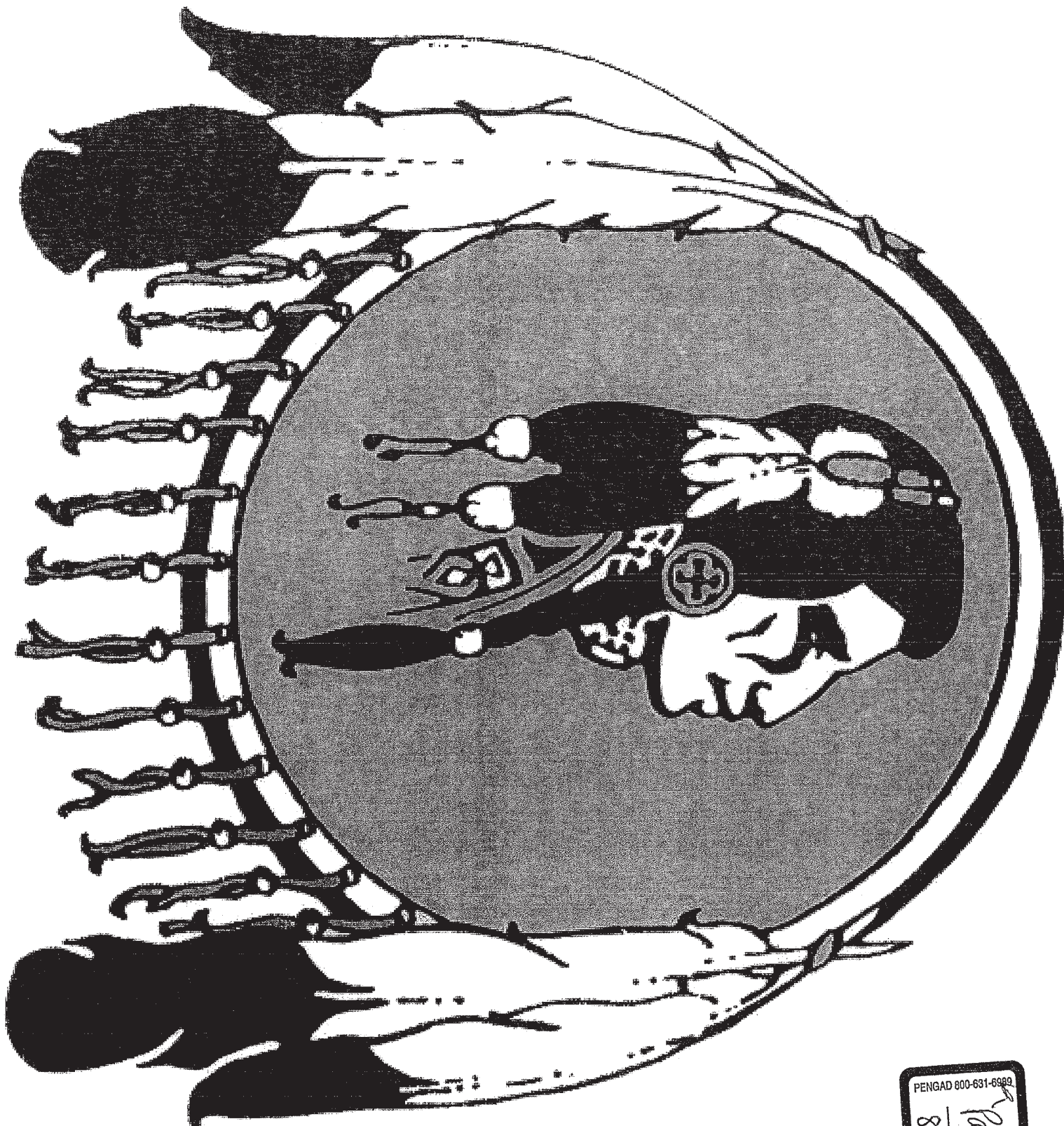

Date

CERTIFICATE OF SERVICE

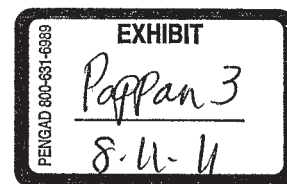
The undersigned hereby certifies that on September 3, 2010, he caused a copy of the foregoing Petitioner Jillian Pappan's Response To Respondent's First Set of Interrogatories to be served by first class mail upon the following:

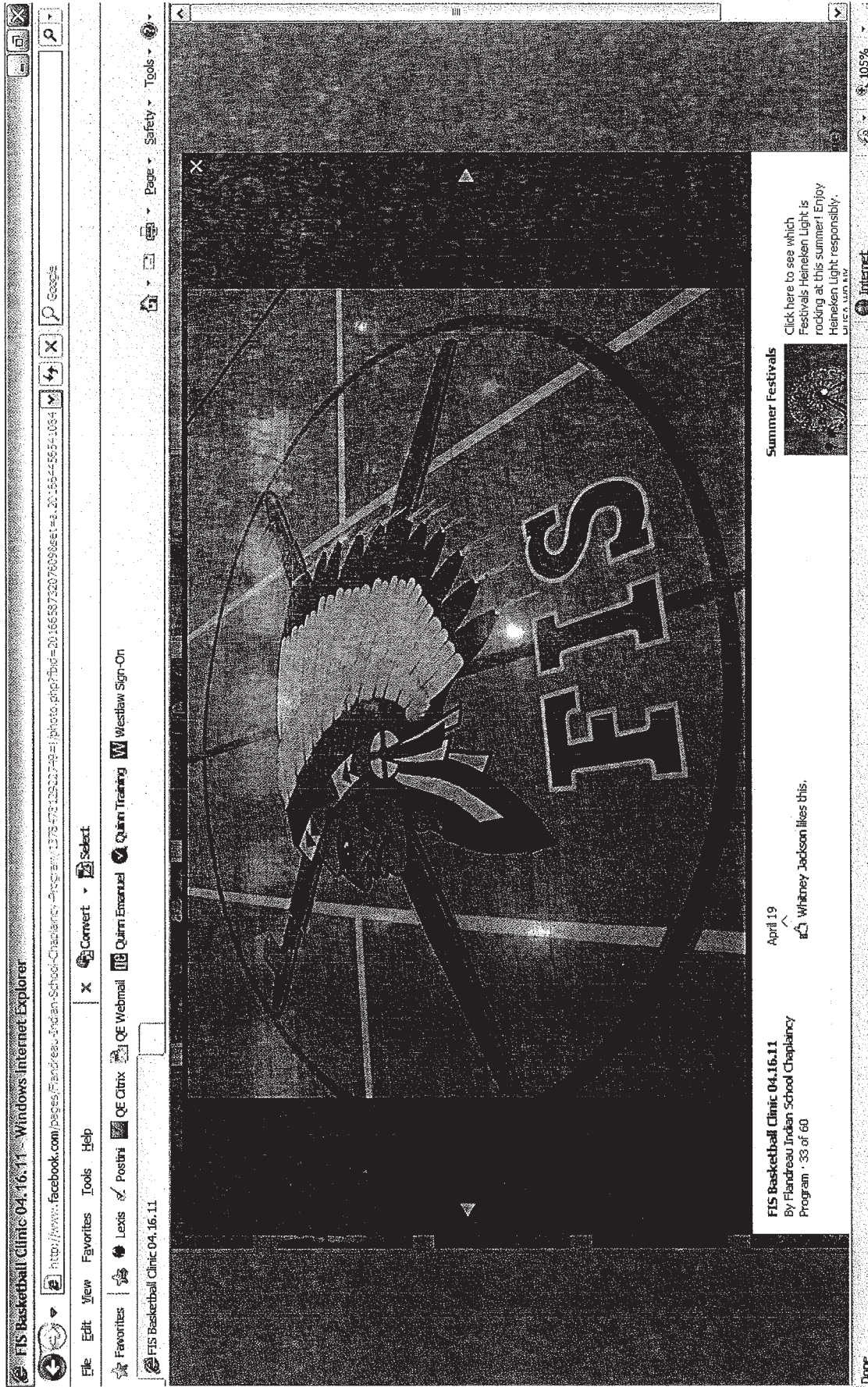
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